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Initial <u>KB</u> Date <u>12/6/</u>93

ACTIVITY DESCRIPTION

The activity provides for the assessment and characterization of past Land Disposal Units (LDUs) and Solid Waste Management Units (SWMUs) at the Idaho Chemical Processing Plant (ICPP) of the Idaho National Engineering Laboratory (INEL). The goal is to determine the nature and extent of the contamination and, if present, whether or no the contamination constitutes a potential threat to human health or safety or to the environment. If a threat exists, the activity will also include studying the feasibility if various remedial action alternatives and reaching an agreement on a proposed action with the necessary regulatory agencies.

The driving force behind this activity is a Resource Conservation and Recovery Act (RCRA)-based Consent Order and Compliance Agreement (COCA) between the Environmental Protection Agency (EPA), Region X and the Department of Energy - Idaho Operations Office (DOE-ID), [United States Geological Survey (USGS) is also a signatory]. It is anticipated that by FY91, a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-based Interagency Agreement (IAG) between the EPA, the State of Idaho, and DOE-ID will also be a driving force.

No firm deadline has been established for completion of this activity. However, terms of the COCA allow the regulatory agency several means to ensure that continued progress is occurring.

ACCOMPLISHMENTS TO DATE

- o Initiated three 750 foot wells for Oct 89 hydrogeological characterization/ groundwater monitoring.
- o Prepared ICCP injection well abandonment May 89 plan and closure plan for well capping.

TASK DESCRIPTION

FY90 activities include preliminary sampling being at 11 LDUs and two SWMUs. Total funding is \$1880K.

FY91 activities will include the final sampling and characterization of the LDUs prior to their remediation. Total funding is \$160K.

FY92 activities will be the characterization conducted at 15 SWMUs. Closure plans and risk assessments will be issued on sites being addressed. Sampling and monitoring well will be drilled as needed. Total funding required is \$1170K.

MILESTONES

ACTIVITY AND DELIVERABLE	START	STOP
Preliminary sampling at two LDUs		Jan 90
Characterize 11 LDUs	Oct 89	Sept 90
Characterize 11 SWMUs	Oct 92	Sept 93
Characterize 18 SWMUs	Oct 93	Sept 94
Characterize 11 SWMUs	Oct 94	Sept 95

FUNDING BASIS

Funding is based on the following needs.

FTE

FY90 funding provides for 4 Full Time Equivalents (FTEs) at a cost of \$400K for project support and management.

FY91 None

FY92 funding will provide for 2 FTEs at a cost of \$200K for project support and management. The increase is due to the increase numbers of units to be considered for assessment.

MATERIALS AND SUBCONTRACTS

FY90 subcontract costs in the amount of \$1480K are planned for LDU and SWMU unit characterization and sampling and analysis needed. Golder, and Associates will be the primary subcontractor for the characterization activities.

FY91 subcontract costs in the amount of \$160K are planned for final LDU and SWMU characterization.

FY92 subcontract costs in the amount of \$970K planned for continued sampling and analysis, closure plans and characterization of SWMUs.

CAPITAL EQUIPMENT

FY90 None

FY91 None

FY92 None

FY90 None

FY91 None

FY92 None

LINE ITEMS

FY90 None

FY91 None

FY92 None

ALTERNATIVE FUNDING JUSTIFICATION (FY91)

There is no difference between target and required funding. If funding is reduced, assessment activities will be delayed, impacted remediation schedules that will be in conflict with agreements made via the COCA and IAG.

PRIORITY RATIONALE

The activities described in this activity data sheet represent activities required to meet the terms of agreements between DOE and local, State, and Federal agencies. This activity is being accomplished under an agreement developed pursuant to Sections 3004(u) and 3008(h) of the RCRA. These activities are consistent with a priority classification of 2.

LEVEL OF CONFIDENCE

The level of confidence associated with this activity data sheet is low. This effort is in the RCRA Remedial Feasibility Investigation (RFI) or CERCLA Remedial Investigation/ Feasibility Study (RI/FS) phase, so information on cleanup activities is of a "preconceptual" nature at best.

ACTIVITY ALTERNATIVES

There are no serious alternatives exist for assessing the units at the ICPP. The goal is to determine the most cost- effective manner to achieve the required reduction in threat to human health and the environment. Delays in funding will merely postpone the activity. If this activity is deferred or delayed, the COCA stipulates two possible outcomes. First, the terms of the COCA may be enforced through citizen suits. Second, the COCA describes a dispute resolution procedure under which the Regional Administrator has the final authority.

ACTIVITY DESCRIPTION

The activity provides for the cleanup of past Land Disposal Units (LDUs) and Solid Waste Management Units (SWMUs) at the Idaho Chemical Processing Plant (ICPP) of the Idaho National Engineering Laboratory (INEL). The goal is to clean up units where contamination constitutes a potential threat to human health or safety or to the environment. This will normally be accomplished by removal of the waste or by treating or stabilizing the waste in place to minimize its potential threat. The cleanup activity may also consist of a combination of the two. Units that are characterized and shown to have no significant contamination should not move to this activity.

No firm deadline has been established for completion of this activity. However, terms of the Consent Order and Compliance Agreement (COCA) allow the regulatory agency several means to ensure that continued progress is occurring.

The driving force behind this activity is a Resource Conservation and Recovery Act (RCRA)-based COCA between the Environmental Protection Agency (EPA), Region X and the Department of Energy - Idaho Operations Office (DOE-ID), [United States Geological Survey (USGS) is also a signatory]. It is anticipated that by FY91, a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-based Interagency Agreement (IAG) between the EPA, the State of Idaho, and DOE-ID will also be a driving force.

ACCOMPLISHMENTS TO DATE

o Initiated capping of the ICPP injection well.

June 89

TASK DESCRIPTION

FY90 activities include capping of the ICPP injection well and remedial action initiated at one LDU (CPP-55). Total funding is \$120K.

FY91 activities will include remedial actions to be initiated at nine LDUs. Remediation will be completed at five LDUs. Remediation will conducted at three SWMUs. Total funding is \$2840K.

FY92 remedial activities will be completed at five remaining LDUs. Remediation will be conducted at 11 SWMUs. Total funding required is \$2330K.

MILESTONES

CTIVITY AND DELIVERABLE	START	STOP
ICPP injection well capped.		Dec 90
Remediation of five LDUs	Oct 90	Sept 91
Complete remediation five other LDUs	Oct 91	Sept 92
Initiate remediation of tank farm	Oct 95	

FUNDING BASIS

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Funding is based on the following needs.

FTE

FY90 None

FY91 funding will provide for 4 Full Time Equivalents (FTEs) at a cost of \$400K for project support and management.

FY92 funding will provide for 2.5 FTEs at a cost of \$250K for project support and management. The decrease is due to the emphasis being placed on characterization and assessment activities in this year.

MATERIALS AND SUBCONTRACTS

FY90 subcontract costs in the amount of \$120K are for the ICPP injection well capping.

FY91 subcontract costs in the amount of \$2440K are planned for the expanded effort of remediation for the five LDUs.

FY92 subcontract costs in the amount of \$2080K are planned for the completion of LDU remediation and initial SWMU remediation. The decrease is due to the lower estimated cost of remediation on the five LDUs than on the previous five.

CAPITAL EQUIPMENT

FY90 None

FY91 None

FY92 None

FY90 None

FY91 None

FY92 None

LINE ITEMS

FY90 None

FY91 None

FY92 None

ALTERNATIVE FUNDING JUSTIFICATION (FY91)

The \$270K increase in the required level is required for accelerating remediation of LDUs. If target levels of funding are not received, these activities will be postponed and will delay out-year activities. This could result in delaying commitments made through the COCA and IAG.

PRIORITY RATIONALE

The activities described in this activity data sheet represent activities required to meet the terms of agreements between DOE and local, State, and Federal agencies. This activity is being accomplished under an agreement developed pursuant to Sections 3004(u) and 3008(h) of the RCRA. These activities are consistent with a priority classification of 2.

LEVEL OF CONFIDENCE

The level of confidence associated with this activity data sheet is low. This effort is in the RCRA Remedial Feasibility Investigation (RFI) or CERCLA Remedial Investigation/ Feasibility Study (RI/FS) phase, so information on cleanup activities is of a "preconceptual" nature at best.

ACTIVITY ALTERNATIVES

Alternatives for each cleanup activity will be assessed, including a no-action alternative. The goal is to determine the most cost-effective manner to achieve the required reduction in threat to human health and the environment. Delays in funding will merely postpone the activity. If this activity is deferred or delayed, the COCA stipulates two possible outcomes. First, the terms of the COCA may be enforced through citizen suits. Second, the COCA describes a dispute resolution procedure under which the Regional Administrator has the final authority.

IAG budget breakdown

AS OF:

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ID-#	WAG	FY-90	FY91 PRES	FY-91 REQ	FY-92 TARG	FY-92 REQ	FY-93	FY-94	FY-95	FY-96
27-e1	COCA	30	50	50		50	50	50	50	50
	TAN-A	2212	3232	3232		1816	2232	708	500	0
	TAN-R	261	500	500		3300	4306	3800	896	500
	TRA-A	3062	2993	12577		7876	3556	2400	2700	660
	TRA-R	201	250	2200		2300	1990	1100	3500	20000
	ICPP-A	1880	160	160		1170	1150	1775	900	0
	ICPP-R	120	2840	3110		2330	2660	1225	2100	3000
	CFA-A	1596	2104	2104		1830	1867	1314	171	0
	CFA-R	0	2465	2465		1600	4750	4600	1150	500
	PBF/ARA-A	608	900	1250		85	1350	1000	1000	1000
	PBF/ARA-R		686	875		2129	1200	2000	2000	2000
	EBR/BOR-A		110	110		575	0	0	0	0
	EBR/BOR-R		0	90		220	1500	1700	500	250
	MISC-A	0	310	310		366	265	50	0	0
	MISC-R	0	0	0		0	200	100	0	.0
SUBTO	r coca	9975	16600	29033		25647	27076	21822	15467	27960
40-E1	BWP									
	PRG MGMT	13243	13000	13000		12000	12000	12000	14000	14000
	TECH INV	20392	¹ 25116 ²	25116 ²		35000	35000	35000	50000	50000°
	WAG-7	12808	18000	18000		18000	18000	18000	19000	19000
	SUPP FAC	3600	9000	9000		23000	8000	2000	1000	1000
SUBTO!	r BWP	50043	65116	65116		88000	73000	67000	84000	84000
44-E1	HAZWRAP	l 700	0	200		200	0	0		70_
	IIAZWINAE	700	U	200		200	J	•	罗	ح°و
TOTAL	IAG	700 60718	81716	94349		113847	100076	88822	99467	151960 M
	1- FY 90	Technology	Investigat	ions was	increased	from the	baseline	\$18.7m	with ati	vities m

1- FY 90 Technology Investigations was increased from the baseline \$18.7m with achiving from VVED that are reported under WAG-7 baseline. This will show the \$20.392m as AGD.

2- FY 91 Tech. Inv. increases to \$25.116m to include the Pu recovery task of \$2 56m that Clyde Frank has indicated will be included in BWP funding level.

TAROOO